

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ELIZABETH A. STANTON,
Personal Representative of
JOSEPH H. SANTARLASCI, III,
Deceased, and Administrator of the
Estate of JOSEPH H. SANTARLASCI, III
Plaintiff,

V.

Civil Action No. 02-4779

LAFAYETTE COLLEGE

and

ERIN MALONE
Defendants.

ORDER

AND NOW this _____ day of _____, 2002, upon consideration of the motion of plaintiff for admission of Peter C. Grenier, Esquire and Anne R. Noble, Esquire *pro hac vice*, and any opposition thereto, it is hereby **ORDERED** and **DECREED** that the motion is **GRANTED**. Peter C. Grenier, Esquire and Anne R. Noble, Esquire are hereby admitted to the United States District Court for the Eastern District of Pennsylvania for the purpose of appearing and participating in all aspects of this case on behalf of plaintiff Elizabeth A. Stanton, the personal representative of Joseph Santarlaschi, III, deceased, and the administrator of the Estate of Joseph H. Santarlaschi, III.

BY THE COURT:

J.

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Plaintiff,

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MOTION FOR ADMISSION PRO HAC VICE

The undersigned, a member of the Bar of the Supreme Court of the Commonwealth of Pennsylvania and the United States District Court for the Eastern District of Pennsylvania, respectfully moves, *pro hac vice*, for the admission of Peter C. Grenier, Esquire and Anne R. Noble, Esquire, as co-counsel for plaintiff Elizabeth A. Stanton, the personal representative of Joseph Santarlaschi, III, deceased and the administrator of the Estate of Joseph H. Santarlaschi, III (“Plaintiff”). In accordance with rules of this Court, the following is submitted in support of this motion:

1. Peter C. Grenier, Esquire is a member of the law firm of Bode & Grenier, L.L.P. Mr. Grenier is a member in good standing of the Bars of the District of Columbia and the State of Maryland. He is also admitted to practice before the United States District Court for the

District of Maryland, the District of Columbia, and District of Colorado, and the United States Court of Appeals for the Fourth, Tenth and District of Columbia Circuits.

2. Anne R. Noble, Esquire is an associate with the law firm of Bode & Grenier, L.L.P. Ms. Noble is a member in good standing of the Bars of the Commonwealth of Virginia and the State of Florida. She is admitted to practice before the United States District Court for the District of Maryland, the Eastern District of Virginia and the Middle District of Florida, the United States Court of Appeals for the Fourth, Fifth, Sixth and Seventh, Tenth and District of Columbia Circuits, and the Supreme Court of the United States.

3. Mr. Grenier and Ms. Noble are intimately familiar with the factual background and legal issues involving this complex wrongful death and survival action arising from the December 2, 2001 drowning of Joseph H. Santarlasci, III which occurred while Mr. Santarlasci was swimming in a pool owned by defendant Lafayette College ("Lafayette").

4. As a result of the extensive experience and qualifications of Mr. Grenier and Ms. Noble, Plaintiff has requested that they represent Plaintiff in all pre-trial matters and serve as lead trial counsel.

5. It is our opinion and belief that Mr. Grenier and Ms. Noble have specialized and unique knowledge with respect to the issues presented in this case and are particularly suited and qualified to prosecute this case on behalf of Plaintiff. It is also our opinion that their participation, with the assistance of the undersigned counsel of record duly admitted to the bar of this Court, will result in both a more effective representation of Plaintiff and a more efficient presentation of Plaintiff's case before this Court.

6. In further support of this Motion, we attach hereto as Exhibits "A" and "B" respectively, the Affidavits of Peter C. Grenier, Esquire and Anne R. Noble, Esquire.

7. All pleadings, motions, briefs and other papers filed with the Court will be signed by Jonathan S. Ziss, Esquire, Daniel S. Bernheim, 3d, Esquire or another member of the firm of Silverman, Bernheim & Vogel, as attorneys of record and as authorized members of the bar of the United States District Court for the Eastern District of Pennsylvania.

WHEREFORE, Plaintiff respectfully requests that the proposed Order attached hereto be entered granting the admission *pro hac vice* of Peter C. Grenier, Esquire and Anne R. Noble, Esquire.

SILVERMAN BERNHEIM & VOGEL

BY: _____

JONATHAN S. ZISS, ESQUIRE
Identification No. 42437
DANIEL S. BERNHEIM, 3d, ESQUIRE
Identification No. 32736

Attorneys for ELIZABETH A. STANTON,
Personal Representative of
JOSEPH H. SANTARLASCI, III
and Administrator of the Estate of
JOSEPH H. SANTARLASCI, III

Of Counsel:

Peter C. Grenier, Esquire
Anne R. Noble, Esquire
BODE & GRENIER, LLP
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1150 Connecticut Avenue NW
Washington DC 20036
Telephone: 202 828 4100
Facsimile: 202 828 4130

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Plaintiff,

v.

LAFAYETTE COLLEGE

and

ERIN MALONE
Defendants.

Civil Action No. 02-4779

WASHINGTON

DISTRICT OF COLUMBIA

:
:
: **SS:**
:

Peter C. Grenier, being duly sworn according to law, hereby deposes and says that:

1. I am a member of the law firm of Bode & Grenier, L.L.P, 1150 Connecticut Avenue NW, Ninth Floor, Washington, D.C. 20036.

2. I am a member in good standing of the Bars of the District of Columbia and the State of Maryland. I am also admitted to practice before the United States District Court for the District of Maryland, the District of Columbia, and District of Colorado, and the United States Court of Appeals for the Fourth, Tenth and District of Columbia Circuits.

3. I have extensive experience litigating complex personal injury cases including wrongful death and survival actions.

4. I have no outstanding ethics complaints against me.

5. Plaintiff Elizabeth A. Stanton, personal representative of Joseph H. Santarlasci, III, Deceased, and Administrator of the Estate of Joseph H. Santarlasci, III (“Plaintiff”) has requested that I represent her in the above-captioned litigation.

6. This Affidavit is respectfully submitted in support of the motion for my admission to this Honorable Court *pro hac vice*. There is good cause for such admission, specifically: I, and my firm, have extensive experience litigating this type of complex, personal injury case; my firm has conducted an extensive investigation into the tragic drowning death of Mr. Santarlasci, and I am familiar with the facts of this matter and the legal theories that are being asserted against defendants; Plaintiff has consulted with me and has requested that I represent her interests in this matter in all pre-trial proceedings and that I serve as lead trial counsel.

7. I represent to the Court that if I am admitted *pro hac vice*, I understand that I am subject to the provisions of the Local Rules of the United States District Court for the Eastern District of Pennsylvania, and the Rules of Professional Conduct. I certify that I will fully comply with the foregoing Rules.

8. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

PETER C. GRENIER, ESQUIRE

Sworn and subscribed before

me this ____ day of
_____, 2002.

Notary Public

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Plaintiff,

V.

Civil Action No. 02-4779

LAFAYETTE COLLEGE

and

ERIN MALONE
Defendants.

WASHINGTON

$$\vdots$$

:

SS:

:

DISTRICT OF COLUMBIA

Anne R. Noble, being duly sworn according to law, hereby deposes and says that:

1. I am an associate with the law firm of Bode & Grenier, L.L.P, 1150 Connecticut Avenue NW, Ninth Floor, Washington, D.C. 20036.

2. I am a member in good standing of the Bars of the Commonwealth of Virginia and the State of Florida. I am also admitted to practice before the United States District Court for the District of Maryland, the Eastern District of Virginia and the Middle District of Florida, the United States Court of Appeals for the Fourth, Fifth, Sixth and Seventh, Tenth and District of Columbia Circuits, and the Supreme Court of the United States. of the Bars of the District of Columbia and the State of Maryland.

3. I have extensive experience litigating complex personal injury cases including wrongful death and survival actions.

4. I have no outstanding ethics complaints against me.

5. Plaintiff Elizabeth A. Stanton, personal representative of Joseph H. Santarlasci, III, Deceased, and Administrator of the Estate of Joseph H. Santarlasci, III ("Plaintiff") has requested that I represent her in the above-captioned litigation.

6. This Affidavit is respectfully submitted in support of the motion for my admission to this Honorable Court *pro hac vice*. There is good cause for such admission, specifically: I, and my firm, have extensive experience litigating this type of complex, personal injury case; my firm has conducted an extensive investigation into the tragic drowning death of Mr. Santarlasci, and I am familiar with the facts of this matter and the legal theories that are being asserted against defendants; Plaintiff has consulted with me and has requested that I represent her interests in this matter in all pre-trial proceedings and that I serve as lead trial counsel.

7. I represent to the Court that if I am admitted *pro hac vice*, I understand that I am subject to the provisions of the Local Rules of the United States District Court for the Eastern District of Pennsylvania, and the Rules of Professional Conduct. I certify that I will fully comply with the foregoing Rules.

8. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

ANNE R. NOBLE, ESQUIRE

Sworn and subscribed before

me this ____ day of
_____, 2002.

Notary Public